

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
:
UNITED STATES OF AMERICA
:
-v.-
:
VAUGHAN RICHMOND,
:
Defendant.
:
- - - - - x

CONSENT ORDER OF
FORFEITURE

S1 10 Cr. 243 (VM)

WHEREAS, on or about March 22, 2011, VAUGHAN RICHMOND (the "defendant"), was charged in a four-count Information, S1 10 Cr. 243 (VM) (the "Information"), with conspiring to commit wire fraud and bank, in violation of 18 U.S.C. § 1349 (Count One), and committing bank fraud in violation of 18 U.S.C. § 1344 (Counts Two through Four);

WHEREAS, the Information included a forfeiture allegation, seeking forfeiture to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), of all property, real or personal, constituting or derived from proceeds traceable to the wire and bank fraud offenses alleged in Counts One through Four of the Information, including but not limited to at least \$9,170,000 in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained as a result of the wire and bank fraud offense;

WHEREAS, on or about March 22, 2011, the defendant pled guilty to Counts One through Four of the Information and admitted the forfeiture allegation, pursuant to a plea agreement with the

Government, wherein the defendant agreed to forfeit a sum of money equal to \$9,170,000 in United States currency, representing the amount of proceeds obtained as a result of the offenses charged in the Information;

WHEREAS, the defendant consents to a money judgment in the amount of \$9,170,000 in United States currency, representing the proceeds obtained as a result of the offense charged.

IT IS HEREBY STIPULATED AND AGREED, by and between the plaintiff, United States of America, by its attorney Preet Bharara, United States Attorney, Assistant United States Attorney Justin A. Anderson, of counsel, and the defendant, and his counsel, David Jacobs, Esq., that:

1. As a result of the offenses charged in Counts One through Four of the Information, to which the defendant pled guilty, a money judgment in the amount of \$9,170,000 in United States currency (the "Money Judgment") shall be entered against the defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, upon entry of this Consent Order of Forfeiture, this Order is final as to the defendant, VAUGHAN RICHMOND, and shall be deemed part of the sentence of the defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding Money Judgment

shall be made by postal money order, bank or certified check, made payable, in this instance to the United States Marshals Service, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Asset Forfeiture Unit, One St. Andrew's Plaza, New York, New York 10007 and shall indicate the defendant's name and case number.

4. Upon execution of this Consent Order of Forfeiture, and pursuant to 21 U.S.C. § 853, the United States Marshals Service shall be authorized to deposit the payments on the Money Judgment in the Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, upon entry of this Order, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas, pursuant to Rule 45 of the Federal Rules of Civil Procedure.

6. The Court shall retain jurisdiction to enforce this Order, and to amend it as necessary, pursuant to Rule 32.2 (e) of the Federal Rules of Criminal Procedure.

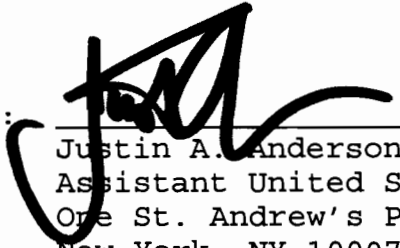
7. The Clerk of the Court shall forward three certified copies of this Order to Assistant United States Attorney Sharon Cohen Levin, Chief of the Asset Forfeiture Unit, United

States Attorney's Office, One St. Andrew's Plaza, New York, New York 10007.

8. The signature pages of this Order may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.


AGREED AND CONSENTED TO:

PREET BHARARA
United States Attorney for the
Southern District of New York
Attorney for Plaintiff

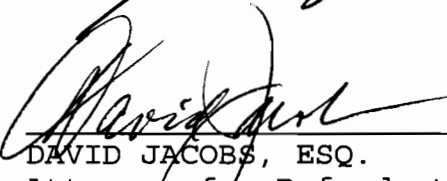
By: 
Justin A. Anderson
Assistant United States Attorney
One St. Andrew's Plaza
New York, NY 10007
(212) 637-1035

9/22/2011
DATE

VAUGHAN RICHMOND


By: 
VAUGHAN RICHMOND

9/23/2011
DATE

By: 
DAVID JACOBS, ESQ.
Attorney for Defendant

9/23/2011
DATE

SO ORDERED:


HONORABLE VICTOR MARRERO
UNITED STATES DISTRICT JUDGE

23 September 2011
DATE